

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION**

FILED
DEC 22 2016 DB
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN.

Helen Castle

Name of Plaintiff

v.

Eric K Fanning, Secretary of the Army
DA Docket Number:
ARFTCAMP14MAR00987
EEOC Case Number: 470-2015-00164X

Name of Defendant(s)

Case No. _____
(To be assigned by Clerk)
Jury Demand ☐ Yes ☐ No

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964, and the Civil Rights Act of 1991, for employment discrimination. Jurisdiction is specifically conferred upon the Court by 42 U.S.C. § 2000e-5, or, if the Plaintiff is a federal employee, by 42 U.S.C. § 2000e-16. Relief is sought under 42 U.S.C. § 2000e-5(g) and/or 42 U.S.C. § 1981a(b).

2. Plaintiff, Helen Castle, is a citizen of the United States and resides at
215 Aster Dr Clarksville
Street address City
Montgomery TN 37042 931-278-0489
County State Zip Code Telephone Number

3. Defendant, Dept of Army
Blanchfield Army Community Hospital resides at, or its business is located at
650 Joel Dr Ft Campbell
Street address City
Ky 42223
County State Zip Code

(If more than one Defendant, list the name and address of each additional Defendant)

Filed against DR Quentin Humbert (Dept of Behavioral Health)

4. Plaintiff sought employment from the Defendant or was employed by the Defendant at

650 Joel Dr, Ft Campbell,
 Street address City
_____, KY, 42223.
 County State Zip Code

5. Defendant discriminated against Plaintiff in the manner indicated in paragraphs 8 and 9 of this Complaint on or about July 16 2013.
 Month Day Year

6. Plaintiff filed charges against the Defendant with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission charging the Defendant with the acts of discrimination indicated in paragraphs 8 and 9 of this Complaint on or about April 22 2014.
 Month Day Year

7. The Equal Employment Opportunity Commission or the United States Department of Justice issued a Notice of Right to Sue which was received by Plaintiff on October 04 2016, a copy of which Notice is attached.
 Month Day Year

8. Because of Plaintiff's (1) x race, (2) _____ color, (3) _____ sex,
 (4) _____ religion, (5) _____ national origin, the Defendant:

- a. failed to employ Plaintiff.
- b. ^x terminated Plaintiff's employment.
- c. failed to promote Plaintiff.
- d. ^x retaliated against Plaintiff for having filed a charge of discrimination.
- e. ^x other. Explain: _____

Sent intimidating emails, downgraded position, hostile working environment. did not communicate with me. treated different than other employees.

9. The circumstances under which Defendant discriminated against Plaintiff were as follows:

Violated my civil rights, retaliation, adverse treatment, adverse actions, negative evaluation, isolated me from other employees, affected my terms of employment. *Compromised my health. caused extreme emotional distress.*

(You may use additional paper, if necessary.)

10. The acts set forth in paragraph 8 of this Complaint:

- a. are still being committed by Defendant.
- b. ^x are no longer being committed by Defendant.
- c. _____ may still be being committed by Defendant.

11. Plaintiff attaches to this Complaint a copy of the charges filed with the Tennessee Human Rights Commission or the Equal Employment Opportunity Commission, which charges are submitted as a brief statement of the facts supporting this Complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief:

- a. _____ direct that Defendant employ Plaintiff, or
- b. _____ direct that Defendant re-employ Plaintiff, or
- c. _____ direct that Defendant promote Plaintiff, or
- d. _____ order other equitable or injunctive relief: _____

- _____.
- e. _____ direct that Defendant pay Plaintiff back pay in the amount of _____ and interest on back pay;

- f. ^x _____ direct that Defendant pay Plaintiff compensatory damages: Specify the amount and basis for compensatory damages:

300000.00, pain/suffering, destroyed my physical and mental health, loss of enjoyment of life, career l

- g. ^x _____ direct that Defendant pay Plaintiff punitive damages in the amount of 100000.00 _____ because Defendant engaged in a discriminatory practice or practices with malice or with reckless indifference to Plaintiff's federally protected rights, as described in paragraphs 8 and 9 above; and that the Court grant such other relief as may be appropriate, including costs and attorney's fees.

Jules Castle (Gossett)
(Signature of Plaintiff)

12.23.16

10. I was terminated Oct 2016 while on FMLA

Helen Castle
AR FT CAMP 14 MAR
00987

11.F Work place treatment became totally debilitating. Humiliation.
difficult sleeping, hated to come to work, Compromised my health severely.
Ongoing emotional distress on a daily basis. Increased health issues.
unable to practice as License Practical Nurse.

11.G Failed to accommodate me, loss of Employment, loss of enjoyment of life
severe depression, insomnia, crying all the time Emotional pain, loss of
confidence. Held up my disability Retirement paperwork, which hurt me
financially.

DA Docket